

REMARKS/ARGUMENTS

Claims 1, 3, 4 and 6-10 are currently pending in this application, as amended. By the present Reply, claims 1 and 7 have been amended, claim 5 has been canceled, and new claims 8-10 have been added. No new matter has been introduced into the application by these amendments.

Claim Objections

In the Action, claims 1 and 3-7 were objected to due to a lack of antecedent basis for the “rotational drive” in claim 1. This has been corrected, as noted above. Accordingly, withdrawal of this objection to claims 1 and 3-7 is respectfully requested.

Claim 7 was also objected to as including a mix of statutory classes. This has also been addressed by the amendments above, so that it is clear that claim 7 is directed to the cleaning device, and not to a method of producing it. Accordingly, withdrawal of this objection to claim 7 is also requested.

Claim Rejections - 35 U.S.C. §102

In the Action, claims 1, 3 and 4 were rejected as anticipated by U.S. 6,561,096 (Munz ‘096), which is an earlier patent of the present inventor. In response, claim 1 has been amended to incorporate the subject matter of claim 5, and accordingly, this rejection has been rendered moot.

Claim Rejections – 35 U.S.C. §103

Claims 5 – 7 were rejected as obvious in view of Munz. Applicant respectfully traverses this rejection. To the extent that claim 5 has been incorporated into claim 1, this rejection will be addressed with respect to claim 1.

As amended, claim 1 is directed to a cleaning device for printing cylinders in which a rotational drive allocated to the at least one cleaning brush is arranged in a circular envelope formed by an outer periphery of the cleaning brush, and a rotor of the

rotational drive is formed as a brush body.

Contrary to the assertion in the Action, Munz '096 does not disclose a "drive" integrated in the brush as claimed in claim 1 as presently amended. Applicant notes that the term "drive" is used in a different manner in the Munz '096 than in the present application. Regarding the present application the term "rotational drive" is clearly used in the sense of an "engine" or "motor". A motor is a device which transfers energy, e.g. electrical energy, chemical energy, etc. into mechanical energy. There are a number of passages in the application supporting the meaning of the term "rotational drive" as being used in the sense of "motor"(e.g. paragraphs [0011], [0028]). There are no passages which would support an interpretation that "rotational drive" may mean anything else but a motor.

Contrary to the present invention, the term "drive" as used in Munz '096 is not defined or explained in more detail, and no examples are given which could lead to a specific understanding of the term. The plug-in fittings mentioned in col. 7 lines 17-20 do not necessarily need to serve as a current source for an electrical motor. They could as well connect electrical sensors or other electrical components. Accordingly, the interpretation has to be based on the broadest meaning of the term "drive", which also covers gears, transmissions, etc.

Accordingly, the general term "drive" as used in the Munz '096 reference cannot relate to the specific requirement provided by the term "rotational drive" as used in the present application.

Additionally, the passage of Munz '096 reference (col. 7 lines 58 to 62) cited in the Office action does not disclose that the rotational drive allocated to the cleaning brush is arranged in a circular envelope formed by an outer periphery of the cleaning brush, since it is only stated in the respective passage that "... rotational brush ... is ... integrated in the brush... ." This does not suggest that the drive is completely integrated into the brush. Accordingly parts of the drive may extend out of the brush and may extend in various directions beyond the envelope of the cleaning brush. The drive according to Munz '096 is absent from the '096 patent figures. Accordingly, an

interpretation of the cited passage does not support or suggest the interpretation noted in the Office Action.

Moreover, as already acknowledged in the Office Action, Munz '096 does not disclose the rotor of the rotational drive being formed as the brush body.

Further, Munz '096 specifically relates to improving the connectability between a guide rail and a longitudinally traveling carriage. A person skilled in the art would therefore not have considered its teaching for the purpose of creating a space-saving cleaning device.

Moreover, neither Munz '096 nor any of the other references discloses or suggests the claimed subject matter according to the newly amended claims.

Motors, in particular electric motors, usually comprise a housing (i.e.) in which a rotationally driven rotor is received. Accordingly the rotor, i.e. the moving part is located inside the stator. These motors can be purchased as standardized and reliable components at low prices. It would not have been obvious to the person skilled in the art to use motors for the design of his cleaning device which deviate from the standard motor construction.

Applicant notes that it has been a goal for a long time to reduce the space needed for cleaning devices and other devices for printing machines. Despite this long felt need, nobody (including Applicant) had previously considered implementing the presently claimed arrangement. This is a further indication for the non-obviousness of the present invention. This point of view is also supported e.g. by the solution disclosed in US 5,524,805 (Shiba et al.) and US 5,927,205 (Jentzsch et al.) which were also cited in the Office Action. Both references apparently refer to standard electric motor having a rotor rotatably housed in a stator. In order to transfer the rotating movement of the rotor to the web feed roller Shiba even suggests a complicated gearing mechanism as shown in Fig. 3 of the Shiba reference. In both cases it appears as if the inventive solutions of the present application would have been superior over the proposed embodiments of these references. Nevertheless, the skilled applicants of these references proceeded in a direction opposite to the present invention.

Applicant: Richard Munz
Application No.: 10/568,032

In view of the above, Applicant submits that claim 1 should be patentable over his prior invention in Munz '096, as well as all of the other known prior art, and withdrawal of the section 103 rejection of claim 1 is respectfully requested.

Claims 3, 4 and 6-10 depend directly or indirectly from claim 1 and could be similarly patentable.

Conclusion

If the Examiner believes that any additional minor formal matters need to be addressed, or that a telephone interview would help to materially advance the prosecution of this application, the Examiner is invited to contact the undersigned by telephone at the Examiner's convenience.

In view of the foregoing amendments and remarks, Applicant respectfully submits that the present application, including claims 1, 3, 4 and 6-10, is in condition for allowance, and a notice to that effect is respectfully solicited.

Respectfully submitted,

Richard Munz

By /Randolph J. Huis/
Randolph J. Huis
Registration No. 34,626
(215) 568-6400

Volpe and Koenig, P.C.
United Plaza, Suite 1600
30 South 17th Street
Philadelphia, PA 19103
RJH/dmm